

EXHIBIT A

EXHIBIT A

Jordan K. Cameron (12051)
CAMERON RINGWOOD, LC
6975 South Union Park Avenue
Suite 600
Cottonwood Heights, UT 84047
Telephone: (385) 463-2425
Email: jordan@cameronringwood.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

APOTHECARY MOVEMENT, LLC, a Utah
limited liability company,

Plaintiff,

vs.

BH ELEGANT LINENS, LLC dba AA
WHOLESALE DEALS, a New Jersey
company,

Defendants.

**AFFIDAVIT OF JORDAN K.
CAMERON IN SUPPORT OF ENTRY
OF DEFAULT JUDGMENT**

Case No.: 2:23cv00845-DAO

Magistrate Judge Daphne A. Oberg

Jordan K. Cameron, being first duly sworn and having personal knowledge of the matters asserted herein, depose and state as follows:

1. I am an attorney with the law firm of Cameron Ringwood, LC
2. I am the attorney for Plaintiff in the above-captioned matter.
3. A Complaint was filed herein on November 16, 2023.
4. On November 22, 2023, Plaintiff served Defendant BH Elegant Linens, LLC dba

AA Wholesale Deals with the *Summons* and *Complaint*.

5. Defendant's deadline to plead or otherwise defend this action was December 13, 2023.

6. More than twenty-one (21) days have elapsed since Defendant was served, and the Defendant has failed to plead or otherwise defend as provide by the Federal Rules of Procedure.

7. As the Defendant is not an individual, but a business entity, the Defendant is not in the military service, as required by 50 U.S.C. App. § 521.

8. The Defendant is not an infant or incompetent person, as required by Fed. R. Civ. P. 55(b)(1).

9. The amount of damages for claims of Plaintiff against Defendant can be made certain by computation.

10. Paragraph 31 of the *Complaint* identifies \$49,614 in overpayments made by Plaintiff to defendant for short-shipped goods.

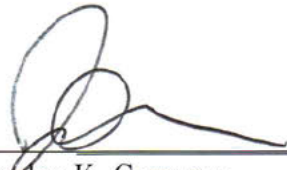
11. Paragraph 32 of the *Complaint* identifies losses in the monthly amount of \$169,195 since August 2023.

12. Computing \$169,195 from August through the date of this filing, Defendant is liable to Plaintiff for four months of loss, equaling \$676,780.

13. Defendant is liable to Plaintiff for to the total sum of \$726,394.

14. Therefore, the claim of the Plaintiff against Defendant is for the sum of \$726,394 plus interest from the date of judgment as provided by law.

EXECUTED this 15th day of December 2023,



Jordan K. Cameron

STATE OF UTAH)

: SS

COUNTY OF SALT LAKE)

On this 15th day of December 2023, personally appeared before me, Jordan K. Cameron, who acknowledged that he read the foregoing documents, that the same is true and correct to the best of his knowledge and belief.





NOTARY PUBLIC
Residing at Utah County, Utah